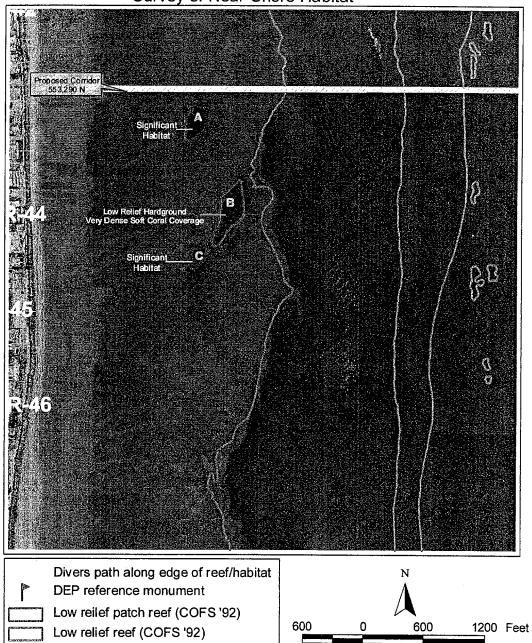


Figure 3: Alternate Test Beach Fill Area Survey of Near-Shore Habitat





Appendix A: Summary of Quantitative Transects
(Note: Species name is coded by the first three letters of the species name and the first four letters of the genus

name.)

	Category	HC	tally	Area (cm-2)	SC	tally	SP	tally	Other	tally	AL
11	2	DIC STOK	3	60.67	PSE AMER	8	NIP EREC	32	MIL ALCI	7	HAL OPUN
1	2	MEA MEAN	1	3.14	PLE FLEX	2	NIP DIGI	19	PAL CARI	2	DIC BART
1	2	MON ANNU	1 .	353.43	EUN SUCC	6	AMP COMP	28	STO SABU		RFA SPEC
1	2	MON CAVE	1	6.28	PTE CITR	1	IOT BIRO	13	TUN SPEC		UDO SPEC
11	2	SCO SPEC	1	1.77	BRI ASBE	21	APL FIST	3			BGA SPEC
1	2	SID RADI	8	52.82	EUN CALY	2	APL CAUL	21			CCA SPEC
1	2	SID SIDE	2	7.66	EUN PALM	3	MON SPEC	12			
1	2	SID SPEC	8	35.74			XES MUTA	3			
1	2	STE MICH	6	100.73			NIP AMOR	20			1
1	2						CAL VAGI	5			
1	2						MON BARB	14			
1	2						CLI SPEC	7			
1	2						IRC FELI	3			-
1	2						PSE CRAS	3			
1	2			1			DIC RUET	15			
1	2		•	,		-	CAL PLIC	1			
1	2						DYS SPEC	2			
1	2						ECT FERO	2			-
1	2			<u> </u>			IRC STRO	1			
1	2						MON UNGU	3			
1	2						PTI SPEC	1	-		
1	2						DIP MEGA	2			
2	2	DIC STOK	4	24.74	PLE HOMO	1	APL FIST	7	STO SABU		DIGRADE
2	2	SID SIDE	1	9.42	EUN SPEC	8	AMP COMP	53	1	40	DIC BART
2	2	STE MICH	4	47.32	MUR SPEC	1			MIL ALCI	12	HAL OPUN
		STEWICH	-4	41.32			ECT FERO	3			BGA SPEC
2	2		1		EUN PALM	16	NIP EREC	34			CCA SPEC
2	2			,	GOR VENT	1	CHO SPEC	3			BAT SPEC
2	2				BRI ASBE	5	NIP AMOR	14			
2	2				PSE AMER	5	DIP MEGA	1			
2	2				EUN MAMM	1	DYS SPEC	18			
2	2				PTE CITR	1	MON SPEC	4			
2	2				EUN CALY	3	NIP DIGI	2			
2	2				PLE FLEX	2	PTI SPEC	3			
2	2						APL CAUL	8			
2	2						CLI SPEC	3			
2	2						IRC CAMP	3			
2	2						SPO UNID	7			
2	2						DIC RUET	9			
2	2						CAL VAGI	2			
2	2						IRC FELI	1			
3	3	DIC STOK	1	1.18	MUR SPEC	1	APL FIST	25	MIL ALCI	9	HAL OPUN
3	3	MON CAVE	2	1339.89	BRI ASBE	62	NIP AMOR	5	BAR ANNU	3	DIC BART
3	3	POR SPEC	1	0.79	EUN CALY	22	AMP COMP	8		- -+	UDO SPEC
3	3	SID RADI	1	0.79	PLE FLEX	16	CIN SPEC	1	 		3200, 20
3	3	SID SPEC	4	11.78	EUN SUCC	3	PSE CRAS	1			
3	3	STE MICH	1	12.57	PLE SPEC	6	PTI SPEC	3	 		
3	3				PLE NUTA	3	IRC STRO	4	<u> </u>		
3	3				GOR VENT	5	DIC RUET	5			
3	3				EUN PALM	41	CAL VAGI	5	·		
3	3				PTE CITR	3	NIP EREC	5			
3	3				PSE AMER						
						19	DYS SPEC	1	ļ		
3	3				EUN SPEC	32	XES MUTA	1			
3	3				PSE ACER	2	CLI SPEC	1			
3	3				PSE SPEC	9	IRC FELI	2			
3	3				PTE ANCE	1					
3	3				EUN MAMM	1					

3	3	1	 	1	EUN KNIG	2	1			,	
3	3	· · · · · · · ·			PLE HOMO	1		-		 	
4		ACD CEDV		22.70			NID HAGO	 			
	3	ACR CERV	2	22.78	PTE CITR	9	NIP AMOR	11	MIL ALCI	4	DIC BART
4	3	AGA SPEC	1	9.42	PLE FLEX	2	MYC LAEV	1	PAL CARI	8	CCA SPEC
4	3	DIC STOK	3	33.77	BRI ASBE	47	ANT VARI	3		<u> </u>	HAL OPUN
4	3	DIP CLIV	1	74.22	EUN SUCC	3	NIP EREC	12			
4	3	MON CAVE	2	617.32	EUN CALY	3	DIC RUET	10	<u> </u>		
4	3	POR ASTE	6	479.88	GOR VENT	6	AMP COMP	19			
4	3	SID RADI	3	35.74	PSE SPEC	3	APL FIST	5			
4	3	SID SIDE	1	6.87	PSE AMER	3	IRC FELI	3			
4	3	SID SPEC	3	11.00	EUN SPEC	2	DYS SPEC	6			
4	3	STE MICH	2	3.14	EUN PALM	2	SPH VESP	1		-	
4	3			<u> </u>	PSE ACER	1	NIP DIGI	3			
4	3				PTE SPEC	_4	ECT FERO	1			
4	3						HOL HELW	1			
4	3						CHO SPEC	3			
4	3						PTI SPEC	2			 -
4	3						IRC STRO	1			
4	3						IRC CAMP	1			
5	2	ACR CERV	2	26.70	BRI ASBE	64	STR SPEC	1	MIL ALCI	12	DICBART
5	2	POR SPEC	2	12.76	EUN SPEC	11	NIP EREC	12	PAL CARI	3	HAL OPUN
5	2	SID RADI	7	5.69	EUN PALM	5	CHO SPEC	4	ZOA PULC	3	UDO SPEC
5	2	SID SIDE	2	35.74	PSE AMER	3	APL FIST	4	25.11 020	<u> </u>	CCA SPEC
- 5	2	SOL BOUR	3	573.34	PSE SPEC	4	ECT FERO	1	 	 	AMP RIGI
5	2				PLE NUTA	4	AMP COMP	5	 		7.001
5	2				PTE ANCE	2	IRC STRO	1	 		
5	2				EUN MAMM	3	DYS SPEC	13	· · · · · · · · · · · · · · · · · · ·	 	
5	2				PLE FLEX	6	DIC RUET	5	 		
5	2				PLE HOMO	3	NIP AMOR	3			
5	2	 			EUN CALY	1	NIP DIGI	1	 		
5	2				GOR VENT	1	CIN SPEC	1			
5	2				PSE BIPP	1	PTI SPEC	5		ļ	
5	2				PTE CITR	1	IRC FELI	1		<u> </u>	ļ
5	2	·			1 IL OIL		CAL VAGI	2			
5	2	-					IRC CAMP	3			
5	2						APL CAUL	1			
		חסם פסבס		20.27	DDI ACDE		L		1 200		
6	3	POR SPEC	4	28.27	BRI ASBE	34	NIP EREC	13	MIL ALCI	14	CCA SPEC
6	3	SID RADI	10	21.79	PSE AMER	2	AMP COMP	12	STO SABU		DIC BART
6	3	SID SPEC	12	24.15	EUN SPEC	9	IRC FELI	2	PAL CARI	3	HAL OPUN
6	3	SOL BOUR	1	100.53	PLE NUTA	16	CAL VAGI	1	MIL COMP	1	AMP RIGI
6	3	STE MICH	1	106.81	PTE CITR	8	APL FIST	5	TUN SPEC		CAU SPEC
6	3				PLE FLEX	5	CON NUCL	3	CAN SIMP		
6	3				EUN SUCC	4	DYS SPEC	2			
6	3				MUR MURI	1	DIC RUET	3			
6	3				GOR VENT	1	SPH VESP	2			
6	3				PTE ANCE	5	PTI SPEC	1			
6	3			-	EUN MAMM	5	IRC STRO	4			
6	3				ERY CARI	1	NIP AMOR	5			
6	3				PSE SPEC	5	CLI SPEC	1			
6	3						IOT BIRO	1		_	
6	3						CAL VAGI	1			
7	2	DIC STOK	1	54.98	EUN MAMM	15	ECT FERO	2	PAL CARI	2	BGA SPEC
7	2	POR SPEC	2	10.21	BRI ASBE	41	CIN SPEC	30	MIL ALCI	4	DICBART
7	2	SID RADI	11	24.35	PLE NUTA	6	APL FIST	15			UDO SPEC
7	2	SID SPEC	1	21.99	EUN PALM	9	CLI SPEC	1	 		CAUSPEC
7	2	SOL BOUR	1	235.62	EUN SPEC	44	DYS SPEC	1	 		CCA SPEC
7	2	STE MICH	5	120.95	PSE AMER	3	IRC CAMP	1	 		HAL OPUN
7	2				PTE CITR	1	CHO SPEC	1			INC OF UN
7	2	-		·····	PLE HOMO	1	AMP COMP	4	 		
7	2				PTE ANCE	- 2	NIP EREC	7			
7	2				PLE FLEX	3	DYS SPEC	4	 		
7	2				PSE SPEC	3	NIP AMOR	1	 		
7	2				EUN CALY	21	MON SPE				
					LONGALT	۲۱	INION SPE	1	1		

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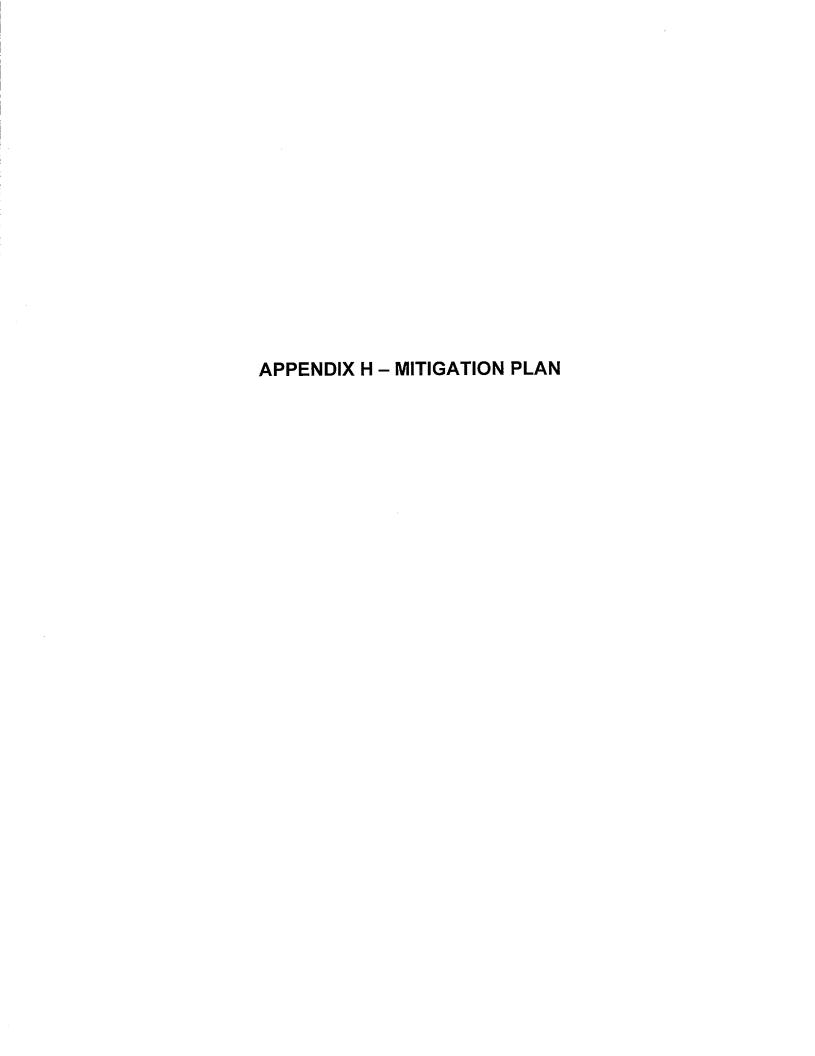
7	2		-		EUN SUCC	25	CAL VAGI	2	1		1
7	2				PSE AMER	2	ANT VARI	1			
7	2				GOR VENT	1	,	+			
7	2				MUR SPEC	1		1			
7	2				PTE SPEC	2					
8	2	DIC STOK	1	1.57	PSE ACER	5	CLI SPEC	1	MIL ALCI	5	CAU SPEC
8	2	POR SPEC	10	113.88	PLE NUTA	2	NIP AMOR	4			HAL GOUR
8	2	SID RADI	18	41.58	EUN SUCC	11	CIN SPEC	1			BGA SPEC
8	2	SOL BOUR	1	23.56	PTE ANCE	6	NIP EREC	2	·		UDO SPEC
8	2	STE MICH	2	190.85	BRI ASBE	19	IRC STRO	2			DICBART
8	2				EUN SPEC	3	IRC SPEC	1			CCA SPEC
8	2				PSE SPEC	4	CIN SPEC	6			
8	2		-		ERY CARI	2	ANT VARI	1			
8	2				EUN CALY	5	AMP COMP	5			
8	2				PTE SPEC	5	APL CAUL	1		_	

Hard Coral		Soft Coral		Sponges		Algae		
Species	Density	Species	Density	Species	Density	Other Species	Density	Species
ACR CERV	0.04	BRI ASBE	2.93	AMP COMP	1.34	MIL COMP	0.01	AMP RIGI
AGA SPEC	0.01	ERY CARI	0.03	ANT VARI	0.05	BAR ANNU	0.03	BAT SPEC
DIC STOK	0.13	EUN CALY	0.57	APL CAUL	0.31	ZOA PULC	0.03	BGA SPEC
DIP CLIV	0.01	EUN KNIG	0.02	APL FIST	0.64	PAL CARI	0.18	CAU SPEC
MEA MEAN	0.01	EUN MAMM	0.25	CAL PLIC	0.01	MIL ALCI	0.67	CCA SPEC
MON ANNU	0.01	EUN PALM	0.76	CAL VAGI	0.18	CAN SIMP	Species	DIC BART
MON CAVE	0.05	EUN SPEC	1.09	CHO NUCL	0.13	STO SABU	Not	HAL OPUN
POR ASTE	0.06	EUN SUCC	0.52	CIN SPEC	0.39	TUN SPEC	Counted	RFA SPEC
POR SPEC	0.19	GOR VENT	0.15	CLI SPEC	0.14			UDO SPEC
SCO SPEC	0.01	MUR MURI	0.01	DIC RUET	0.47		Ŀ	
SID RADI	0.58	MUR SPEC	0.03	DIP MEGA	0.03			
SID SIDE	0.06	PLE FLEX	0.36	DYS SPEC	0.47			
SID SPEC	0.28	PLE HOMO	0.06	ECT FERO	0.09			
SOL BOUR	0.06	PLE NUTA	0.31	HOL HELW	0.01			
STE MICH	0.21	PLE SPEC	0.06	IOT BIRO	0.14			
		PSE ACER	0.08	IRC CAMP	0.08			
		PSE AMÉR	0.45	IRC FELI	0.12			
		PSE BIPP	0.01	IRC SPEC	0.01			
		PSE SPEC	0.28	IRC STRO	0.13			
		PTE ANCE	0.16	MON BARB	0.14			
		PTE CITR	0.24	MON SPEC	0.17			
		PTE SPEC	0.11	MON UNGU	0.03			
	•			MYC LAEV	0.01			
				NIP AMÓR	0.63			
				NIP DIGI	0.25			
				NIP EREC	1.17			
				PSE CRAS	0.04			
				PTI SPEC	0.15			
				SPH VESP	0.03			
				SPO UNID	0.07			
			ŀ	STR SPEC	0.01			
			- 1	XES MUTA	0.04			

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Appendix C: Guide to Species Abbreviations

	Hard Corals		Sponges		Other
code	species	code	species	code	species
ACR CERV	Acropora cervicornis	AMP COMP	Amphimedon compressa	MIL COMP	Millepora complanata
AGA SPEC	Acropora species	ANT VARI	Anthosigmella varians	BAR ANNU	
DIC STOK	Dichocoenia stokesii	APL CAUL	Aplysina cauliformis	ZOA PULC	
DIP CLIV	Diploria clivosa	APL FIST	Aplysina fistularis	PAL CARI	Palythoa caribaeorum
MEA MEAN	Meandrina meandrites	CAL PLIC	Callyspongia plicifera	MIL ALCI	Millepora alcycornis
MON ANNU	Montastrea annularis	CAL VAGI	Callyspongia vaginalis	CAN SIMP	Canda simplex
MON CAVE	Montastrea cavernosa	CHO SPEC	Chondrilla species	STO SABU	
POR ASTE	Porites asteroides	CIN SPEC	Cinachyra species	TUN SPEC	
POR SPEC	Porites species	CLI SPEC	Cliona species		•
SCO SPEC	Siderastrea siderea	CON NUCL	Chondrilla nucula	-	
SID RADI	Siderastrea radians	DIC RUET	Dictyonella ruetzleri		
SID SIDE	Siderastrea species	DIP MEGA	Diplastrella megastellata		
SOL BOUR	Solenastrea boumoni	DYS SPEC	Dysidea species		Algae
STE MICH	Stephanocoenia michelini	ECT FERO	Ectyoplasia ferox	code	species
İ		HOL HELW	Holopsammia helwigi	AMP RIGI	Amphiroa rigida
		IOT BIRO	lotrochota birotuata	BAT SPEC	Batophora species
f		IRC CAMP	Ircinia campana		Blue Green Algae species
	Soft Corals	IRC FELI	Ircinia felix	CAU SPEC	Caulerpa species
code	species	IRC SPEC	Ircinia species		Corallinacean species
BRI ASBE	Briareum asbestinum	IRC STRO	Ircinia strobilina		Dictyota bartayresi
ERY CARI	Erythropodium caribaeorum		Monanchora barbensis	HAL OPUN	Halimeda opuntia
EUN CALY	Eunicea calyculata		Monanchora species	RFA SPEC	Red Filamentous Algae species
EUN KNIG	Eunicea knightii	MON UNGU	Monanchora unguifera	UDO SPEC	Udotea species
EUN MAMM	Eunicea mammosa	MYC LAEV	Mycale laevis		•
EUN PALM	Eunicea palmeri	NIP AMOR	Niphates amorpha		
EUN SPEC	Eunicea species	NIP DIGI	Niphates digitalis		
EUN SUCC	Eunicea succinea	NIP EREC	Niphates erecta		
GOR VENT	Gorgonia ventalina	PSE CRAS	Pseudoceratina crassa		
MUR MURI	Muricea muricata	PTI SPEC	Ptilocaulis species		
MUR SPEC	Muricea species	SPH VESP	Spheciospongia vesparium		
PLE FLEX	Plexaura flexuosa	SPO UNID	unidentified sponge		
PLE HOMO	Plexaura homomalla	STR SPEC	Strongylacidon species		
PLE NUTA	Plexaurella nutans	XES MUTA	Xestospongia muta		
PLE SPEC	Plexaurella species				
PSE ACER	Pseudoptergorgia acerosa				
PSE AMER	Pseudoptergorgia americana				
PSE BIPP	Pseudoptergorgia bipinnata				
PSE SPEC	Pseudoptergorgia species				
PTE ANCE	Pterogorgia anceps				
PTE CITR	Pterogorgia citrina				
PTE SPEC	Pterogorgia species				



MITIGATION PLAN FOR PLACEMENT OF DREDGE SLURRY PIPELINES ON HARDGROUND AREAS IN ASSOCIATION WITH CONSTRUCTION OF THE "MODIFICATIONS TO SUNNY ISLES SEGMENT AND BEACH RENOURISHMENT AT MIAMI BEACH"

Ref: Florida Department of Environmental Protection Permit No.: 0126527-002-JC and

US Army Corps of Engineers (Jacksonville, Fl) RFP No.: DACW17-00-R-0025

I BACKGROUND

The US Army Corps of Engineers (ACOE), Jacksonville District has received the above referenced Florida Department of Environmental Protection (FDEP) permit to renourish 2.75 miles of the Sunny Isles Beach in Miami-Dade County. Additionally, the ACOE has submitted a request to modify the permit and include an additional 2,500 feet of beach along northern Miami Beach, and establish a second pipeline corridor at the south end of the Sunny Isles segment. Although the above referenced permit covers only the Sunny Isles segment is approved, the present mitigation plan considers the additional impacts associated with the conduct of the additional Miami Beach segment (as identified in the submitted modification request).

The renourishment will be accomplished using a hopper dredge, which would collect sand from approved borrow areas and pump the sand slurry to the beach via a submerged pipeline. Due to draft restrictions of the vessel and the topography of the ocean floor off the work areas, the dredge will be restricted to areas seaward of the eastern edge of the first reef. Thus, the submerged slurry pipeline would have to be placed across the hardground areas locally known as "first reef". The FDEP Permit provides for placement of the pipeline within a defined 50 ft. wide corridor across the reef areas. The modification presently under consideration requests a separate corridor for the Miami Beach segment, and an additional corridor at the southern end of the Sunny Isles segment. If the second corridor (south end of Sunny Isles) is approved and utilized, the amount of mitigation will be modified accordingly, using the methods detailed for determination impacts within the corridors. The considerations and mitigation discussion below is based on the use of one corridor per segment.

Preliminary impact assessments have been conducted by Miami-Dade Department of Environmental Resources Management (DERM) and submitted to the state. Based on these estimates up to 306m^2 of benthic impact is possible within the Sunny Isles pipeline corridor, and up to 400m^2 of benthic impact is possible within the proposed northern Miami Beach pipeline corridor. Post-pipeline removal assessments associated with previous similar pipeline placements have shown the actual (documented) impacts to be range between 20% and 80% of pre-project estimates. In consideration of the range of actual documented impacts, it is expected that between 141 m² and 565 m² of benthic impacts will be associated with the pipeline placements necessary for this project.

II. MITIGATION CONSIDERATIONS:

Mitigation for impacts associated with this project would have two components: (A) salvage (collection and re-stabilization) of dislodged and or fractured hard corals, and (B) "In-kind" mitigation by creation of benthic habitat through the placement of designed artificial reef modules.

- A <u>Hard Coral Salvage and Stabilization</u>. The salvaging and re-stabilization of hard corals would occur immediately after placement of the pipeline
- Early identification and isolation of impacted hard coral colonies or hard coral colonies in jeopardy (shaded by or directly under the path of the pipeline) is imperative. This work should be completed as soon as possible (within two weeks) following placement of the pipeline.
- 2. Relocation areas will be identified into which fractured and dislodged corals will be placed. This will facilitate tracking the survivorship of the relocated corals.
- 3. Corals will be relocated as close as possible to the location they were taken from.
- 4. Corals need to be re-stabilized using proven techniques and adhesives. The methods established and utilized by NOAA National Marine Sanctuary Restoration and Assessment Program (H. Hudson, pers. comm.) will be followed.
- B. <u>In-Kind Mitigation</u>. Considerations for mitigation material includes:
- 1. Relief of mitigation material should be relatively low to approximate the relief of the impacted habitat.
- 2. Materials should provide habitat for a wide variety of fish, invertebrate (both motile and benthic) organisms
- 3. Mitigation should be constructed of materials similar to that of the impacted habitat (i.e., limestone or carbonate based).
- 4. Materials should be placed in as close a proximity to the impacted areas as possible.

III. MITIGATION COMPONENTS

Two materials would satisfy the considerations for materials and mitigation outlined above:

- 1. Limerock boulder, and
- 2. Prefabricated modules composed of pre-cast concrete culverts set in a high-pressure concrete base, and 6-12 inch limerock grouted to the exterior surfaces of the culverts.

We propose utilization of the prefabricated modules for the mitigation, leaving the limerock as an alternative, should the Department so desire to utilize it. If limerock were to be used, it would have to be multi-layered to achieve and intricate habitat appropriate for the mitigation. Multiple layers of limerock, however, would not allow the maintenance of "low relief" mitigation. The use of the prefabricated module was selected as they provide a much more highly complex benthic habitat than limerock boulders, while maintaining a relatively low relief (<5'). This modules is favorable for colonization by a broad spectrum of benthic and motile invertebrates and algae, and

utilization by benthic and demersal fish. The modules (Figure 4) are modification of a design used in previous hard-ground impact mitigation programs (i.e., Sunny Isles Reef Restoration Off-site mitigation; Port of Miami dredge anchor impact mitigation, Bal Harbor sediment impact mitigation, and previous beach renourishment pipeline corridor impact mitigation). Additionally, the design of the module can easily be modified to enhance or minimize specific features (i.e., height, surface area, cryptic space) through varying of the number and size of the culvert pipes used in the construction of the units.

The proposed module overall size will be 6 ft (1.83m) wide by 9 ft (2.74m) long and 4 ft (1.22m) high. The area proposed for placement (see below) would provide for approximately 0.5 feet (0.15m) of settling, creating a habitat with approximately 3.5 ft relief. The design of the module will utilize a single layer of culvert pipes to minimize relief. The addition of the limerocks to the surface substantially increases the surface area of the module. The footprint area of each 6x9 ft. module is 54 ft² (5 m²). The total surface of the module available for colonization is conservatively estimated to be 30 m², which provides a greater than 6:1 surface area-to-footprint ratio. The module design will be evaluated for stability in the water depth and area selected for placement. The weight of the module will be adjusted as necessary to insure appropriate stability.

IV. IN-KIND MITIGATION SITES

There are 11 designated offshore artificial reef sites in Dade County. The closest and preferred reef site, with depths comparable to those found in and around the first reef areas, is the "Anchorage Site" (center point - 25°48'43.5"; 80°05'35.5"; depth range 30 to 55 ft.), located approximately 7 miles south of the Sunny Isles segment and 3 miles south of the Miami Beach Section. The next best location is the "Port of Miami Mitigation Site – A", which is approximately 2 miles further south, with a water depth of 25 feet.

V. CALCULATION OF MITIGATION

The amount of impact within the corridor will be controlled by a number of factors: (i.e., need of repair or re-positioning of the pipeline which requires lifting and replacement; impact by accessory equipment [i.e., marker buoys]; the ability of the pipeline 'collars' to hold the portions of the pipeline off the reef; irregularities of the bottom assisting in holding the pipeline off the reef; and utilization of floating lines or cable motion dampeners on needed marking or lifting buoys to minimize impacts to areas adjacent to pipeline). The varied factors that can effect the amount of area impacted, and past assessments of pipeline impacts indicate actual impact will be less than estimated in the pre-project assessments. Therefore the area of impact, and subsequently, the area of mitigation will be determined by post-pipeline removal assessments.

Impact Assessment Methodology. The impact will be assessed by DERM biologists with experience in identification and evaluation of benthic impacts. Biologists will visually inspect the entire pipeline path to identify and quantify the area and amount (degree) of impact to benthic communities. Such methods will include measurement of all areas of

scarification, denudation, crushing or other modified bottom characteristics attributable to the pipeline and or accessory equipment. The degree of impact will be estimated on a scale of 0-25%, 25-50%, 50-75%, 75-100% and 100%. The actual area of impact will be the product of the measured area and the decimal equivalent of the 'mid-point' of the level of impact. The area requiring mitigation will be the sum of those products, plus the overall area of hard corals impacted (i.e., crushed, fractured, scraped or dislodged).

<u>Mitigation Ratio Considerations</u>. It is requested that the following considerations be taken into account in the determination of the required mitigation:

1. The project is being conducted in the interest of public health and safety (protection of property and life from storms, hurricanes and coastal flooding)

2. Physical alterations to the hardground will be minimal. Past pipeline placements indicate disturbance to the bottom from the pipeline will be significantly less than estimated in the pre-project assessment.

The region the pipeline traverses is dominated by sponges, algae and moderate sized soft corals, which have a relatively short recovery time (2-8 years).

4. Each module placed will provide a minimum of 30 m² of new benthic surface area of colonization and utilization by marine organisms.

Estimated Mitigation Requirement. In consideration of the points stated above, it is proposed to place one $5m^2$ prefabricated module for every $5m^2$ of benthic impact documented during the post-pipeline removal. Additionally, the habitat benefits of the modules can be enhanced through appropriate placement of the modules. Modules placed in proximity to each other, allow for interaction of the motile organisms, and can effectively function as a single unit, enhancing the effectiveness of the reef modules.

Based on the pre-project assessments, and in consideration of the range of actual impact levels documented, the projected impact associated with the two pipeline corridors will be between $141 \, \mathrm{m}^2$ and $565 \, \mathrm{m}^2$. This would require between 28.2 and 113 modules for mitigation, with the proposed mitigation requirement (i.e., 1 module per $5 \, \mathrm{m}^2$ impact). It should be noted that the actual amount of mitigation will be based on the documented impacts within the pipeline, and may be more or less from the estimates given above.